

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHESTER TSANG, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

VS.

LDK SOLAR CO., LTD., Xiaofeng Peng, Xingxue Tong, Liangbao Zhu, Yonggang Shao, Gang Wang, Jack Lai, and Qiqiang Yao,

Defendants.

WEICHEN G. LUI, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

VS.

LDK SOLAR CO., LTD., XIAOFENG PENG,  
XINGXUE TONG, LIANGBAO ZHU,  
YONGGANG SHAO, GANG WANG, LOUIS  
T. HSIEH, JACK LAI, NICOLA SARNO,  
YUEPENG WAN, RONGQIANG CUI,  
PIETRO ROSSETTO, QIQIANG YAO,

Defendants.

(additional caption on following page)

**DECLARATION OF BRIAN BROOKS IN SUPPORT OF MOTION OF  
WEICHEN G. LUI TO CONSOLIDATE, TO BE APPOINTED LEAD PLAINTIFF,  
AND FOR APPROVAL OF HIS SELECTION OF LEAD COUNSEL**

	)	
ISMAEL HALIDOU, Individually and On Behalf	)	
of All Others Similarly Situated,	)	<b>CIVIL ACTION NO. 07-CV-9745-JGK</b>
	)	
Plaintiff,	)	"ECF CASE"
	)	
vs.	)	
	)	
LDK SOLAR CO., LTD., XIAOFENG PENG,	)	
XINGXUE TONG, LIANGBAO ZHU,	)	
YONGGANG SHAO, GANG WANG, LOUIS	)	
T. HSIEH, JACK LAI, NICOLA SARNO,	)	
YUEPENG WAN, and QIQIANG YAO,	)	
	)	
Defendants.	)	
	)	

I, Brian D. Brooks, declare as follows:

1. I am an associate of the law firm Murray, Frank & Sailer LLP, counsel for Weichen G. Lui. I submit this Declaration in Support of Mr. Lui's Motion to Consolidate, to be Appointed Lead Plaintiff, and for Approval of his Selection of Lead Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the notice published over the MARKET WIRE on October 9, 2007, providing notice of the filing of a class action complaint against defendants.

4. Attached hereto as Exhibit B is a true and correct copy of the Plaintiff's Certification executed by Weichen G. Lui.

5. Attached hereto as Exhibit C is a chart detailing the damages suffered by Mr. Lui.

7. Attached hereto as Exhibit D is a true and correct copy of the firm résumé of Murray, Frank & Sailer LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10, 2007.

/s/  
Brian D. Brooks